

# AHMAD KESHAVARZ

## *Attorney at Law*

16 COURT ST., 26TH FLOOR  
BROOKLYN, NY 11241-1026

[WWW.NEWYORKCONSUMERATTORNEY.COM](http://WWW.NEWYORKCONSUMERATTORNEY.COM)  
E-mail: [ahmad@NewYorkConsumerAttorney.com](mailto:ahmad@NewYorkConsumerAttorney.com)

PHONE: (718) 522-7900  
FAX: (877) 496-7809

January 25, 2013

Magistrate Judge Viktor V. Pohorelsky  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Via ECF**

**Re: *Agreed revised deadline for the serving of opposition papers among the parties (not effecting the filing date).***

**Case No. 1:12-cv-00587-DLI-VVP, Caroline Mayorga v. First Resolution Investment Corporation, et al, Eastern District of New York.**

Dear Judge Pohorelsky:

The undersigned, with co-counsel, represents Plaintiff in this Fair Debt Collection Practices Act class action.

All parties have agreed – and respectfully request the Court to consider -- the following briefing schedule modification. The current deadline is January 28, 2013 for the parties to serve their respective oppositions to the motion to amend and the motions to dismiss. The parties request a one week extension of that deadline to February 4, 2013.

Importantly, this does not change the deadline for the Replies or to “bundle rule” filing of the respective motions, which will remain February 12, 2013. Nor are the parties requesting the alteration of the February 19, 2013 oral argument date.

The parties jointly and respectfully request this one week modification as to the serving of opposition papers.

Respectfully,

/s/

Ahmad Keshavarz

cc: all attorneys of record via ECF

Attorney Manny Newburger via email [mnewburger@bnswwlaw.com](mailto:mnewburger@bnswwlaw.com)